



Response

Comment A-6 (Continued)

A-6 United States
Environmental Protection
Agency

1. Comments noted.

	UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 10 1200 Sixth Avenue Seattle, Washington 98101
Reply To Attn of: OW-137	AUG 23 1996
Harold White, P.E. Project Engineer Washington State Department of Transportation 2714 North Mayfair Street Spokane, WA 99207-2090	RECEIVED DEPARTMENT OF TRANSPORTATION AUG 28 1996 SPokane, WA 99207-2090
Re: EPA Project No. 96-44 North Spokane Freeway Spokane Valley Rathdrum Prairie Sole Source Aquifer	
Dear Mr. White:	
<p>We have reviewed the Draft Environmental Impact Statement (DEIS), which was submitted to the Environmental Protection Agency (EPA), for the proposed construction of a new freeway which will be located in Spokane, Washington. Although EPA did review and provide comments to this document, we have been further requested by the Federal Highway Administration (FHWA) to review and comment on those activities, as a result of this project, that may impact the ground water resource.</p>	
<p>Based on the information we have received, we understand that:</p>	
<ul style="list-style-type: none">• The Spokane County Aquifer Protection Program has been contacted to provide assistance regarding the Spokane County Aquifer Protection Plan and/or Spokane County's Guidelines for Storm water Management;• All storm and surface water run off will be routed through grass swales or other integrated storm and surface water detention/sedimentation basin systems;• A Storm water Site Plan will be developed and approved for both temporary and permanent BMPs as detailed in the Washington State Department of Transportation Highway Runoff Manual and the Water Quality Study for Waters of the State of Washington, WAC 173-201A;• Washington State Department of Transportation will conform with the Wellhead Protection Plan that is being developed by the City of Spokane.	
RECEIVED AUG 29 1996 HAROLD WHITE, P.E. Steve <i>ARC</i>	
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Response

Comment A-6 (Continued)

1. Comments noted.

Comments to the DEIS:

Whenever feasible, a vegetated retention and/or detention basin with an appropriate overflow system (if necessary), should be used to reduce contaminant loadings to ground water. In areas that experience geologic conditions and/or unusual climatic events, i.e., large rainfall events, the addition of an appropriate overflow or similar Best Management Practice (BMP) should be incorporated into the Storm water Site Plan. While the goal of treating storm and surface water run off is to allow the contaminated run off to simply filter through a vegetated medium (grass), site specific limitations and/or special conditions must be taken into consideration when designing the appropriate storm and surface water treatment and disposal systems.

Based on our comments, we have found that the DEIS for the North Spokane Freeway adequately addresses the major concerns needed to protect the quality of the Spokane Valley Rathdrum Prairie Sole Source Aquifer. We approve of this project as planned, since it appears that there will be no adverse effects to ground water quality.

Thank you for the opportunity to review this DEIS. This concludes our review under Section 1424(e) of the Safe Drinking Water Act. We appreciate your efforts to protect ground water quality. If you have any questions regarding this review, please contact Calvin Terada at (206) 553-4141.

Sincerely,

Scott E. Downey, for
Lauris C. Davies, Manager
Ground Water Protection Unit

cc: Shaun Cutting, Federal Highway Administration, Olympia
Stan Miller, Spokane County, Aquifer Protection Program
Kirk Cook, WA DOE, Olympia
David Jennings, WA DOH, Olympia
Julie Hagensen, EPA, Director, Washington Office

Response

Comment A-7

A-7 Spokane Parks and Recreation

1. Comments noted. The preferred alternative is the Market/Green, North Option route.

SPOKANE PARKS AND RECREATION DEPARTMENT NORTH SPOKANE FREEWAY E.I.S. REVIEW¹

PARK	PROPOSED MITIGATION	PARK BOARD AND STAFF COMMENTS
LIBERTY PARK	"Liberty Park is approximately 91 meters (300 feet) south of the centerline of the proposed I-90 C/C system. The park is currently affected by the physical presence and noise associated with existing I-90 and 3rd Avenue, and these conditions will remain much the same. The NSF will improve noise conditions by the presence of a noise wall along the edge of the proposed system. This will lower the noise level below what currently exists and keep it within federal standards. Access will not change, and no other impacts are projected that would substantially impair the park's features, attributes, or activities." ²	We agree with the proposed mitigation.
YOUR PLACE PARK	"The additional freeway right of way line east and west of Your Place Park will extend to the north to the alley between 2nd and Pacific Avenues. The distance from 2nd Avenue to the alley is approximately 46 meters (150 feet), all of which is taken up by the existing park. Park reconfiguration would consist of constructing a 4.6 meter (15 foot) high retaining wall and extending the park to the west along the remainder of the vacated block, using the new right of way. By constructing the retaining wall and extending the park west, the new park dimensions would be approximately 23 meters (75 feet) wide by 91.5 meters (300 feet) long, with a total area of approximately 2090 square meters (22500 square feet). The park would lie north of the revised right of way line, and the city would retain jurisdiction. This new area represents an increase in area of approximately 418 square meters (4500 square feet)." ³	

¹Impacts from the Havana Alternative to Minnehaha Park and Esmeralda Golf Course are not sufficiently mitigated not likely to be, to allow their current uses. This review assumes the Market/Greene alternative with the north or south option is the chosen route

²Page 4-151

³Page 4-157

Response

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2. WSDOT will coordinate development of the park reconstruction plans and landscaping with the Parks and Recreation Department with involvement from the Neighborhood.

3. A Roadside Master Plan will be developed to provide guidance to the design process. Native trees, shrubs, and grasses are proposed, to visually soften the structural elements. Some non-native shade trees and/or shrubs may be interspersed among the native plantings to provide continuity and cohesiveness with vegetation found with the parks and residential neighborhoods bordering the proposed alignment. The plan will address long term maintenance of the landscaping. The public, neighborhood groups and affected local agencies will be involved in the development of the plan.

YOUR PLACE PARK (continued)	<p>"Vehicle access to the park would be from Altamont Street on the west and Cook Street on the east. The park will also be connected to a proposed pedestrian /bicycle trail that will be constructed along the north side of the I-90 C/D system.</p> <p>Noise impacts will be mitigated by construction of a noise barrier along the north edge of the proposed I-90 C/D system."⁴</p> <p>"Project construction would directly impact Your Place Park, located at the corner of Cook Street and Second Avenue. Construction of the C/C system and the southbound to westbound ramps from the North Spokane Freeway will require about 0.1 hectare (.22 acre) of park property."⁵</p> <p>"Direct access to the park by vehicle from the south (currently 2nd Avenue) will not [be] available, because the park will abut I-90 right-of-way. Park reconstruction (see the 4 (f) Section of this document), along with the proposed trail system along the north side of the C/ System, will help maintain and improve non-vehicular access from the surrounding neighborhood. The noise wall proposed along the C/D system will maintain noise levels within federal standards."⁶</p>	We support the reconfiguration of the park and request the WSDOT coordinate development of park reconstruction plans and landscaping plans with the Parks and Recreation Department.	2
EAST CENTRAL COMMUNITY CENTER			3
CHIEF GARRY PARK	<p>"Chief Garry Park is approximately 381 meters (1250 feet) from the centerline of the proposed roadway. Even though the roadway is to be elevated, the facility will not be visible to park users, due to the terrain and features of the park and surrounding area. Access will remain unchanged and noise levels will be within federal standards."⁷</p>	<p>We agree with the proposed mitigation.</p> <p>To ensure visual and noise impacts are minimized to the park we request coordination with the neighborhood and Parks and Recreation Department during facility design.</p>	3

⁴Page 4-157

⁵Page 4-152

⁶Page 4-152

⁷Page 4-148.

Response

Comment A-7 (Continued)

TUFFY'S TRAIL		
CENTENNIAL TRAIL		
MINNEHAHA PARK	<p>"Minnehaha Park, north of Euclid, has maintained playground area and equipment, tennis courts, and natural rock outcrops. It is well used by local residents. In addition to two historically significant buildings, the park contains the western remnant of an unmortared, uncut stone wall that formerly encircled much of the park, and the stone foundation of an old tennis court. All are contributing elements to the park's NRHP eligibility. The park is eligible for inclusion in the NRHP under Criterion A for its association with park development in Spokane." "The stone building in Minnehaha Park also meets the NRHP eligibility requirements under Criterion C. The two-story building of rough-cut granite stone is also a contributing factor in Minnehaha Park's overall NRHP eligibility. (See Figure 4-46.)"</p> <p>"The roadway here will traverse through the eastern third of the park on a bridge structure. Construction within the park would involve placement of bridge footings and columns</p> <p>The vertical profile places the roadway approximately 15 to 18 meters (50 to 60 feet) above the existing ground. Construction within the park would involve placement of bridge footings and columns. (Actual number and placements has not been determined at this time)." ^{9, 10}</p>	<p>We agree with the proposed mitigation.</p> <p>To ensure visual and noise impacts are minimized to the park we request coordination with the neighborhood and Parks and Recreation Department during facility design.</p>
COURTLAND PARK	<p>"Courtland Neighborhood Park is approximately 762 meters (2500 feet) west of the centerline of the proposed roadway. Because of the distance between the park and the proposed roadway, the proposed depressed vertical profile of the NSF, and features of the park and surrounding area, the NSF facility will not be visible to park users. Access will remain unchanged and noise levels will be within federal standards."¹¹</p>	<p>We agree with the proposed mitigation.</p> <p>To ensure visual and noise impacts are minimized to the park we request coordination with the neighborhood and Parks and Recreation Department during facility design.</p>

⁹Page 4-202.

¹⁰Page 4-204.

¹¹Page 4-204.

¹²Page 4-149.

Response

Comment A-7 (Continued)

4. The pedestrian overcrossing will be located north of and adjacent of the existing park. Development of the overcrossing and landscaping will be coordinated with School District 81, the Spokane Park and Recreation Department and the Neighborhood.

5. See response 3.

J.J. HILL PARK / WILDHORSE PLAYGROUND	<p>"The alternative passes adjacent to the J.J. Hill Park/Wildhorse Playground on the westerly edge. With the depressed roadway design and the 3.6 meter (12 foot) noise wall proposed along the west edge of the park, the noise levels projected for the park will be within federal standards. Access to the park will remain unchanged from the existing configuration. A pedestrian crossing is proposed in the vicinity of the park to allow crossing of the NSF and BNRR line to the west. The noise wall will be a visual barrier for users trying to look to the west. However, considering that the view would be of the freeway, BNRR, and Market Street, some users may consider this a positive impact. None of these impacts and the associated mitigated actions are projected to substantially impair the park's attributes, features, or activities."¹²</p> <p>"A new pedestrian crossing will be built in the vicinity of Wild Horse Park in Hillyard. The crossing would go over the NSF between the park and the vicinity of Market Street."¹³</p> <p>"...Sections of Wildhorse Park...would be impacted [by noise levels]..."¹⁴</p>	<p>We agree with the proposed mitigation</p> <p>We request that the pedestrian crossing be located on property adjacent to and north of J.J. Hill Park/Wildhorse Playground. To ensure visual and noise impacts are minimized to the park we request coordination with the neighborhood and Parks and Recreation Department during facility design.</p>
HILLYARD SWIMMING POOL	<p>"Hillyard Swimming Pool is approximately 274 meters (900 feet) west of the centerline of the proposed roadway. The NSF facility will not be visible to park users, due mainly to the depressed vertical roadway profile and features of the surrounding area. Access will remain unchanged and noise levels will be within federal standards."¹⁵</p>	<p>We agree with the proposed mitigation.</p> <p>To ensure visual and noise impacts are minimized to the park we request coordination with the neighborhood and Parks and Recreation Department during facility design.</p>

¹²Page 4-149.

¹³Page S-xxxiv.

¹⁴Page 4-23.

¹⁵Page 4-149.

Response

6. The Department has not identified any impacts that would substantially impair Park's facilities other than temporary construction activities. The Department will coordinate with the Park's Department to minimize those activities.

Comment A-7 (Continued)

HARMON PLAYFIELD	"Harmon Playfield is approximately 289 meters (950 feet) west of the centerline of the proposed roadway. The interchange ramps between the NSF and Francis Avenue will be visible to some park users. The mainline is still in a depressed vertical profile through this area and will not be visible from the park. Access will remain unchanged and noise levels will be within federal standards." ¹⁶	We agree with the proposed mitigation. To ensure visual and noise impacts are minimized to the park we request coordination with the neighborhood and Parks and Recreation Department during facility design.
ESMERALDA GOLF COURSE	"The westerly edge of Esmeralda Golf Course will be approximately 427 meters (1400 feet) from the centerline of the NSF, with no impacts resulting from construction of the new roadway. Because of the distance between the golf course and the roadway, and the depressed vertical profile of the roadway, it will not be visible from the golf course. Access will be unchanged and noise levels created by the new NSF will be within federal standards." ¹⁷	We agree with the proposed mitigation. To ensure visual and noise impacts are minimized to the park we request coordination with the neighborhood and Parks and Recreation Department during facility design.

ADDITIONAL PARK STAFF COMMENTS:

1. "Several recreation properties will experience direct impacts as a result of construction of a "build" alternative. The C/D expansion, common to both alternatives, requires property from Your Place Park... In addition to the direct impacts, the "build" route will pass near numerous recreational facilities, such as school playgrounds and neighborhood parks. Impacts to these areas include visual, noise, and access disruptions. None of these impacts, nor any warranted associated mitigation, are expected to substantially impair any of the facilities' attributes, features, or activities."¹⁸

Park Board and staff emphasize that the impacts not substantially impair any of the facilities' attributes, features, or activities.

2. "A meeting with the city of Spokane Parks and Recreation Department was held in March 1993 to discuss impacts on city park properties. City Parks and Recreation representatives voice no special concerns at the meeting, and are willing to work with WSDOT in resolving issues that become evident as the project develops into final design and specific right of way needs are identified."¹⁹

¹⁶Page 4-149.

¹⁷Page 4-149.

¹⁸Page 5-xix.

¹⁹Page 4-112.

Response

Comment A-7 (Continued)

7. Comment noted, the text has been revised.

8. Comments noted. The preferred alternative is the Market/Green, North Option route.

9. Park use will be maintained during the construction of the project. Access to the parks will be provided at all times. Individual routes to and from the parks will be disrupted from construction. An exception is Your Place Park which may be closed temporarily during work in this area. WSDOT will coordinate with City Parks and Recreation personal to minimize the disruptions during the time of construction.

10. St. Patrick's Park and Jim Hill park have been included in the Recreation Section of the FEIS.

City Parks and Recreation representatives did raise major objections at this meeting. The proposed Havana route at that meeting would have cut Esmeralda Golf Course and Minnehaha Park in half.

If any route other than the Market/Greene corridor is ever seriously considered, or if the Market/Greene corridor route is altered, Park Board and staff request the opportunity to again review the impacts on city parks and issue revised mitigations.

3. "The following description of construction impacts has been developed by grouping properties with similar projected impacts together. The order is from the least to the most severe impacts. Due to their relative distance from the project, the following properties would experience very minimal impact during construction operations. There may be some slight delays or disruptions to the major access routes to and from the recreational facilities, especially those that traverse in and around the NSF construction area. During peak periods of construction activity, the sounds of heavy equipment may be noticeable to facility users. None of these impacts is expected to impair facility use. Properties include: East Central Community Center, Playfair Race Track, Chief Garry Park, Cooper Elementary School, Courtland Neighborhood Park, John A. Shaw Junior High School, Regal Elementary School, Hillyard Swimming Pool, Harmon Playfield, Arlington Elementary School, Mead High School, and Wandermere Golf Course. "...The following groups of properties will experience temporary disruptions in major access routes around the NSF construction area. Walking or bikeway routes may be blocked temporarily or detoured during construction operations. Noise generated by construction (over 70 decibels) could temporarily impact users of outdoor facilities, but is not expected to impair individual facility use. Liberty Park, Sheridan Elementary School, Libby Middle School, Tuffy's Trail, The Centennial Trail, J.J. Hill Park/Wildhorse Playground, and Farwell Park/Farwell Elementary/Northwood Junior High School..."²⁰

Park Board and staff's major concern is the loss of parks and facilities due to construction. Any such loss that impairs park or facility use must be mitigated.

4. "...Construction operations will be very apparent to park users, due to the vertical alignment of the proposed roadway, including ramps and bridge structures. The associated use of scaffolding and falsework for bridge and retaining wall work, along with construction staging areas, will contribute to the visual clutter. Best construction management practices will help mitigate activity common to freeway construction, such as air pollution and noise, that might affect historic properties. In the unlikely event that additional cultural resources are encountered during construction, work will be halted pending a review by a professional archaeologist in consultation with the FHWA, Office of Archaeology and Historic Preservation, and any other appropriate agency..."²¹

Park Board and staff's major concern is the loss of parks and facilities due to construction. Any such loss that impairs park or facility use must be mitigated.

Note: Comments 5-6 were written by Parks Department staff and do not appear in the E.I.S.

5. St. Patrick's Park at Wabash and Nelson, and Jim Hill Park at Cook and Joseph are not included in the E.I.S. Please include these parks in the E.I.S. with mitigation similar to Courtland Park.

6. Ann Schneider's individual comments are attached.

²⁰Pages 4-266 and 4-267.

²¹Pages 4-270 and 4-271.

Response

Comment B-1

B-1 M.F.G.W. Inc.

1. Comments noted.

RECEIVED
DEPARTMENT OF TRANSPORTATION
SEP 27 1995
SPOKANE, WA 99207

9104 East Olive Lane North
Sun Lakes, AZ 85248
September 25, 1995

Harold L. White, P. E.
2714 North Mayfair Street
Spokane, Washington 99207-2090

Dear Mr. White:

In regards to the North-South freeway: We have either lived or been connected to the North Spokane area since 1923. We have observed the transportation bottle-neck that exists between I-90 and US 2/395 on the North.

This proposed North-South freeway would do much to alleviate this situation and would add much to the safety of the residents living in this area, and also be an increment to the value of their property.

Sincerely,
W. A. Van Leuven
W. A. Van Leuven, President
M. F. G. W. Inc.

Florence E. Castillo
Florence E. Castillo
Sec-Treas.
M. F. G. W., Inc.

RECEIVED
SEP 27 1995
HAROLD WHITE, P.E.

Response

Comment B-2

B-2 The Park Lane Motel,
Suites & R.V. Park

1. Comments noted.

2. The location of the interchange between I-90 and the NSF is limited by the available distance between the NSF and Sprague Avenue interchange. Moving the interchange east will reduce the available distance to merge traffic on and off the Collector/Distributor lanes. The current spacing meets minimum design standards for the design year of 2020.

3. An interchange with Fancher Road is not planned. An interchange at this location would conflict with Sprague Avenue interchange. For a similar proposal, see the Beltway/Bypass section of FEIS in Chapter 2..

The Park Lane Motel, Suites & R.V. Park
4412 East Sprague Avenue
Spokane, Washington 99212-0803
509-535-1626

September 25, 1995

Mr. Harold L. White, P.E.
Washington State Department of Transportation
2714 North Mayfair Street,
Spokane, Washington 99207-2090

Re: NORTH SPOKANE FREEWAY - Environmental Impact Statement

Dear Mr. White,

Your notice suggested that those that cannot attend are allowed to write to you and make comments. I have the following comment relative to the EIS.

The plan to bring the freeway (N/S) to Interstate 90 at the proximity of "Thor/Freya" - 1 block west of Freya or in that immediate area in my opinion is not well thought out. The area is already OVER IMPACTED by traffic attempting to go N/S on Freya. The traffic trying to go south on Freya from the south side of the freeway (local traffic) is much too heavy now.

If the intent of the planning is to relieve flow, improve safety, then the plan is best addressed if the approach is east of Freya. The current N/S traffic flow will continue to handle a great amount of traffic but new N/S flow on to the Interstate would not contribute immediately to the current problem if moved east some.

The intent of most Interstate traffic I have been told by DOT is not for local traffic, to dump N/S traffic at the Freya area will only increase the present problem not being served at this time, specifically the traffic attempting to go home or go to work off the hill. Perhaps the solution is the Fancher interchange if it ever gets built/replaced with a south road creating a loop on top of the hill and I-90 connecting loops at the interchange.

My regards,

R. Terry Lynch
R. Terry Lynch, CHA, Owner
The Park Lane Motel, Suites & R.V. Park

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SEP 27 1995
HAROLD WHITE, P.E.